



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 16 2014

CERTIFIED MAIL 7009 1680 0000 7679 6590
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Karen M. Trock
Registered Agent for Service of Process, LBH Industries, Inc.
LBH Industries, Inc.
8034 North Central Park Avenue
Skokie, Illinois 60076

Re: Notice of Violation
LBH Industries, Inc./Scott Plating, Inc.
EPA ID No.: ILD056629629

Dear Ms. Trock:

On August 15, 2012, January 31, 2013, and July 16, 2013, a representative of the U.S. Environmental Protection Agency inspected the facility known as Scott Plating, Inc., 8034 North Central Park Avenue, Skokie, Illinois (SPI). However, we have since learned the facility is in fact LBH Industries, Inc., 8034 North Central Park Avenue, Skokie, Illinois, (LBH). The purpose of the inspections was to evaluate LBH's compliance with certain provisions of the Resource Conservation and Recovery Act (the Act) and the corresponding federal regulations. The Act and the regulations govern the generation, treatment and storage of hazardous waste. Please find enclosed a copy of our inspection reports.

Based upon information provided by LBH personnel, our review of records, and our physical observations during the inspections, we determined LBH was engaged in the storage of hazardous waste without a permit, and in violation of certain requirements of the Illinois Administrative Code (IAC), the federal regulations and the Act. If LBH wants to be exempt from the hazardous waste storage permit requirement, it must be in compliance with the conditions for exemption from the hazardous waste storage permit requirement which are located at 35 IAC §§ 722.134(a) and (d) [40 CFR § 262.34(a), (d)]. We find that LBH failed to comply with the following conditions for its exemption from the hazardous waste storage permit requirement.

1. In order to avoid the need for a hazardous waste storage permit, a small quantity generator using containers to accumulate F006 hazardous waste must mark each container of hazardous waste with the date in which accumulation begins. See, 35 IAC

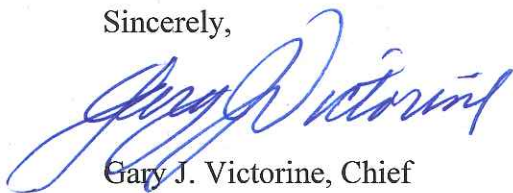
§§ 722.134(a)(2) and 722.134(d)(4) [40 CFR §§ 262.34(a)(2) and 262.34(d)(4)]. However, on August 15, 2012, and January 31, 2013, LBH stored three supersacks containing F006 electroplating sludge behind its facility, but the accumulation dates on the hazardous waste labels were illegible.

2. In order to avoid the need for a hazardous waste storage permit, a small quantity generator using containers to accumulate F006 hazardous waste may not accumulate the waste for longer than 180 days. See, 35 IAC § 722.134(d) [40 CFR § 262.34(d)]. However, no later than August 15, 2012, LBH stored three supersacks of F006 electroplating sludge behind its facility, and 189 days later (on February 20, 2013) sent them to Enviroline of Illinois (ILD981957236). Hazardous Waste Manifest No. 008495242 JJK.

We are not requiring LBH to apply for a hazardous waste storage permit at this time, as long as it immediately complies with the conditions for an exemption from the hazardous waste storage permit as outlined above. We may issue an order assessing a civil penalty for any past or current violations requiring compliance immediately or within a specified time period, pursuant to section 3008(a) of RCRA, 42 U.S.C. § 6928. Although this letter is not such an order, we request you submit to us a response in writing no later than thirty (30) days after receipt of this letter and document the actions you have taken, if any, since our inspections, to comply with conditions for an exemption from the hazardous waste storage permit as outlined above.

You must submit your response to Robert Smith, U.S. EPA, Region 5, 77 West Jackson Boulevard (LR-8J), Chicago, Illinois 60604. If you have any questions please contact Mr. Smith at telephone number (312) 886-7568.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Todd Marvel, Illinois Environmental Protection Agency, Todd.Marvel @Illinois.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, ILLINOIS 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Scott Plating, Incorporated

EPA ID NO.: ILD056629629

LOCATION ADDRESS: 8034 North Central Park Avenue
Skokie, Illinois 60076

NAICS CODE: 332813, Electroplating, Plating, Polishing, Anodizing and
Coloring

RCRA CLASSIFICATION: Small Quantity Generator

DATE OF INSPECTION: August 15, 2012

EPA INSPECTOR: Robert Smith, LPG


PREPARED BY:



Robert Dean Smith, LPG
RCRA Branch, CS-1

1/31/13
Date

REVIEWED BY:


for Walt Francis, Acting Chief
RCRA Branch, CS-1

2-6-13
Date

Purpose of the Inspection

The purpose of the inspection was to evaluate Scott Plating, Incorporated's (Scott) compliance with hazardous waste, universal waste, and used oil requirements of the Resource Conservation and Recovery Act, as amended (RCRA).

Participants

Robert Dean Smith, LPG, Environmental Scientist, EPA
Ed Piwowski, Scott Plating

Facility Description/Facility Process

Scott Plating Incorporated (Scott) is a small quantity generator of hazardous waste. The facility is a small business located in an area of light industry in Skokie, Illinois. The area is mixed residential and light industry.

The facility has three plating lines. Scott takes water samples daily for the metropolitan sanitary district (MSD). Scott takes cyanide samples for MSD at its outfall to the sewer. However, Mr. Piwowski stated that cyanide has not been used at the facility for "a long time".

Scott treats its electroplating solutions and has pre-treatment standards. The treatment of the water generates electroplating sludge from a filter press. The plating fluids are pretreated and then treated with a sulfuric polymer. The only hazardous waste is the F006 sludge that is generated from the treatment of the plating waste water. The water is sent through a three stage filter prior to being sewerred.

Facility Inspections/Observations

I arrived at Scott at 9:40 a.m. I met Mr. Scott Piwowski, an employee of Scott and presented my credentials. I requested to see Mr. Gilbert Trock, the person listed in EPA's RCRAInfo data base as the facility contact. Mr. Piwowski stated that Mr. Gilbert Trock had passed away and his son, Scott, was now the owner of the facility. Mr. Piwowski stated that Mr. Scott Trock was due to come to the facility and he usually was at work by 9:00 a.m. but he had not yet arrived at the facility. Mr. Piwowski stated that one person was just laid off due to slow business.

Mr. Piwowski agreed to show me the facility until Mr. Trock arrived. Mr. Trock never appeared while I was at the facility.

Paperwork Review

Mr. Piwowski provided a manila folder for me when I asked for facility paperwork to review. In the paperwork package were manifests and other papers dealing with environmental issues such as waste water pretreatment paperwork.

August 17, 2007 Illinois EPA letter

I read an August 17, 2007 return to compliance letter from Illinois EPA (IEPA) to Scott Plating. The letter returned Scott to compliance from an August 14, 2007 inspection by Donna Czech, an inspector from IEPA. An earlier April 30, 2007 IEPA letter notified Scott of non-compliance identified during an April 10, 2007 IEPA inspection was in the manila folder provided to me.

The following violations were identified during the April 10, 2007 inspection:

1. 703.121(a), The operator has agreed to accumulate hazardous waste for no longer than 180 days. He has also agreed to submit to the Agency copies of the signed manifests for shipments for shipments of hazardous waste off site for a period of one year from the date of the original inspection (see copy attached). Finally, he has returned to compliance with Section 722.134(d) for small quantity generators of hazardous waste.
2. 722.134(d)(4), The partially filled bag of wastewater treatment sludge (F006) located under the filter press was provided with a "Hazardous Waste" label and an accumulation date.

A list of emergency contacts including the telephone numbers of the local police and fire departments and the name, address, and telephone number of a hospital has been developed and is now kept on file at the facility.

3. 722.134(d)(5), An updated list of emergency coordinators has been developed and is now kept on file at the facility. The required emergency information has been posted near a telephone.
4. 722.141(a), The 2006 generator annual report has been completed and a copy was submitted to the Agency's Des Plaines office as part of the CCA. Mr. Trock agreed to submit the report electronically to the Agency's Planning and Reporting Sections as required.

Upon returning to my office, I discovered that I had taken the original letter with me. The letter was sent back to Scott with return receipt but the letter was either not picked up at the post office by Scott or possibly not accepted for delivery by Scott and returned to EPA.

Hazardous waste manifests

I reviewed several hazardous waste manifests. I reviewed three manifests, one from 2008, one from 2009, and one from 2010. Each manifest was for the shipment of the supersacks of F006 sludge. Some of the manifests were older than 3 years and some did not have return manifests. There was no 2011 manifest available for review nor was there a 2012 manifest available for review. **Of the manifests reviewed, 3 supersacks of F006 were shipped (3200 pounds) and four supersacks (3400 pounds).** The Manifests were signed by Mr. Scott Trock and SET Environmental provided transportation and Envirite was the receiving facility. The manifests reviewed seemed to indicate that the facility is a small quantity generator of hazardous waste.

Hazardous waste determinations

The manila folder had information that indicated that the F006 had been subjected to a hazardous waste determination. No other waste has been determined to be a hazardous waste.

Employee training

I saw some training documents in the facility's manila folder provided to me. The documents were not complete but suggested that hazardous waste training was conducted.

Facility Walk-Through

Mr. Piwowski walked me through the facility. He showed me the electroplating lines. I observed a supersack under the filter press on which a hazardous waste label was affixed.

The facility is in a row of businesses in which some of the businesses appeared to have common walls. An alley is behind the row of businesses. Behind the portion of the building that Scott occupies, is an area where Scott stores filled supersacks of F006 sludge. At the time of the inspection, it appeared that Scott was storing three supersacks outside, behind its facility, in the alley but on Scott property. The supersacks were covered with blue and clear visqueen and had wood pallets on the visqueen and standing upright next to the supersacks.

The three supersacks were about 25 feet from the alley but were totally exposed to anyone who traversed the alleyway. There is no fence or barrier other than the upright wooden pallets.

I could see the hazardous waste labels through the visqueen but I could not read the labels nor could I determine the dates on two labels.

After walking through the facility, and inspecting the supersacks outside the rear of the building, Mr. Piwowski took me to the second floor of the building where offices are located. The offices in the second floor had a telephone but I could not see emergency information posted at or near the telephone. The August 17, 2007 IEPA letter stated that the emergency telephone numbers are to be kept in the facility's file, however, I did not see the list in the file. I asked Mr. Piwowski if there was another file or more to the one given to me and he did not know. While in the office area on the second floor, I asked Mr. Piwowski if there were any listing of emergency numbers that he could see and he responded that he could not see any.

Mr. Piwowski also showed me other rooms in the second floor and also the roof top. No waste was seen in these areas.

Scott Plating Photographs



Facility: Scott Plating, ILD056629629
Location: 8034 North Central Park Avenue, Skokie, Illinois
Date: August 15, 2012
Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels
Description: Photograph 1: Office on the second floor of the Scott Plating facility. I was not able to find a list of emergency contacts at or near the telephone in this photograph. I did not check the rolodex.



Facility: Scott Plating, ILD056629629
Location: 8034 North Central Park Avenue, Skokie, Illinois
Date: August 15, 2012
Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels
Description: Photograph 2: Supersack under the filter press. The supersack has a hazardous waste label.



Facility: Scott Plating, ILD056629629
Location: 8034 North Central Park Avenue, Skokie, Illinois
Date: August 15, 2012
Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels
Description: Photograph 3: Outside of Scott Plating. Scott is the brown brick building with many windows.



Facility: Scott Plating, ILD056629629
Location: 8034 North Central Park Avenue, Skokie, Illinois
Date: August 15, 2012
Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels
Description: Photograph 4. Rear of the Scott Plating building. Scott is storing three supersacks of F006 hazardous waste outside its facility within the confines of the stacked pallets seen here. The supersacks are covered by either clear or blue visqueen. The hazardous waste labels are affixed to the supersacks; however, the ink has either run or cannot be read through the visqueen.



Facility: Scott Plating, ILD056629629
Location: 8034 North Central Park Avenue, Skokie, Illinois
Date: August 15, 2012
Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels
Description: Photograph 4; Close up of the three hazardous waste supersacks in storage behind the Scott Plating facility.



Facility: Scott Plating, ILD056629629
Location: 8034 North Central Park Avenue, Skokie, Illinois
Date: August 15, 2012
Photographer: Robert Dean Smith, LPG
Camera: Nikon Coolpix, 12.0 megapixels
Description: Photograph 5: Close up of the supersacks containing F006 hazardous waste in storage outside and in the rear of the Scott building.

Post-Inspection Briefing

I stated to Mr. Piwowarski that I did not get a complete understanding of the facility due to the lack of paperwork. I stated to Mr. Piwowarski that I could not locate a list of emergency contacts next to the telephone in the second-floor office I inspected in his accompaniment. I also stated that I would return to reinspect the facility in order to obtain the missing paperwork.

Attachments

Inspection Checklist

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO SMALL-QUANTITY GENERATORS OF HAZARDOUS WASTE (100 - 1000 KG/MO.)	
	SUBPART A: GENERAL	
	Section 722.111 Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste it generates is a special waste? <i>not sure from this inspection.</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? <i>Apparently no proof to</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST <i>contrary</i>	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
	If "No", proceed to Section 722.120(e).	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? <i>don't know from file review</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(d)
722.120(e)	Does the generator reclaim waste through a contractual agreement with a recycling facility in which: - the type of waste and frequency of shipments are specified in the agreement? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - the generator has maintained a copy of the agreement for 3 years after termination or expiration of the agreement? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(e)
728.107(a)(10)	Has a small-quantity generator with a tolling (contractual) agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? <i>don't know from file review</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	728.107(a)(10)
	Section 722.121 Acquisition of Manifests	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122

Scott Planting, 8034 W Central Park Av, Skokie, IL 60076
 1LD 056 628 629
 8/15/2012

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: <ul style="list-style-type: none"> - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	722.123(a)
722.123(b)	has the generator apparently given the remaining copies to the transporter? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)
	SUBPART C: PRE-TRANSPORT REQUIREMENTS Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(c))	Section 722.134 Accumulation Time Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words to identify the contents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(d))	Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Note: If the quantity of hazardous waste on-site ever exceeds 6000 kg, the facility is also a storage facility subject to full regulation under Parts 724 and 725 and the permit requirements under Part 703. Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(722.134(a)(2))	Is the accumulation start date marked on each container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	Is each container marked with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>Stored in alley - not in control of street</i>	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? <i>Not sure from file review</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) <i>Not sure, no evidence seen</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Note: If "No", go to Subpart C. COMMENTS: <i>The inspection was difficult due to the absence of Mr. Trock. Mr. Pinnawarski, provided as much assistance as he could. If some paper document requested was not in the file given to me. I cannot say that it does or does not exist.</i> SUBPART J: TANK SYSTEMS Section 725.301 Generators of 100 to 1000 kg/mo. (722.134(a)(2)) Is each tank marked with the words "Hazardous Waste"? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> (725.301(b)(1)) Is the generator in compliance with the treatment or storage of hazardous waste in tanks as referenced in Section 725.117(b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> (725.301(b)(2)) Have hazardous wastes or treatment reagents been placed in a tank causing the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> (725.301(b)(3)) Unless a tank is equipped with drainage control or a diversion structure, do any uncovered tanks have at least 2 feet of freeboard? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> (725.301(b)(4)) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow (i.e. waste feed cutoff system or by-pass system to a stand-by tank)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.301(c))	<p>Is the generator inspecting, where present, the following:</p> <p>1) discharge control equipment at least once each operating day? Yes _____ No _____ N/A _____</p> <p>2) data from monitoring equipment at least once each operating day? Yes _____ No _____ N/A _____</p> <p>3) the level of the waste in the tank at least once each operating day? Yes _____ No _____ N/A _____</p> <p>4) physical evidence of corrosion at least weekly? Yes _____ No _____ N/A _____</p> <p>5) discharge confinement structures to detect erosion or leaking at least weekly? Yes _____ No _____ N/A _____</p>	
(725.301(d))	<p>Has the generator removed all hazardous waste from tanks and associated equipment and structures upon closure of the facility? Yes _____ No _____ N/A _____</p>	
(725.301(e))	<p>If ignitable or reactive wastes are stored in tanks, is the generator in compliance with Section 725.301(e)? Yes _____ No _____ N/A _____</p>	
(725.301(f))	<p>Is the generator in compliance with the regulations concerning incompatible wastes in Section 725.301(f)? Yes _____ No _____ N/A _____</p>	
	<p>COMMENTS:</p> <p><i>no tank holding hazardous waste Facility uses some sort of regeneration process using filters</i></p> <p>SUBPART C: PREPAREDNESS AND PREVENTION</p>	
(725.131)	<p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? <i>no evidence of release seen</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.132)	<p>Is the facility equipped with the following if necessary:</p> <p>a) an internal communication or alarm system(s)? <i>small facility</i> Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>d) water at adequate volume and pressure for fire control? Yes _____ No _____ N/A _____</p>	
(725.133)	<p>Is the facility testing and maintaining communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment? <i>not sure</i> Yes _____ No _____ N/A _____</p>	
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.135)	<p>Is the facility maintaining adequate aisle space? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	

generator - outside

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? - agreements designating the primary authority where more than one police or fire department might respond? - agreements with State emergency response teams, contractors and equipment suppliers? - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? <p>Yes _____ No _____ N/A _____</p>	?
(728.107(a)(5))	<p>Section 728.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?</p> <p>Yes _____ No _____ N/A _____</p> <p>Is the plan on-site?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does the plan include a detailed physical and chemical analysis?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?</p> <p>Yes _____ No _____ N/A _____</p>	PTC but I did not see any thing
(722.134(d)(5))	<p>A) Is there at least one employee on site or on call with the responsibility to coordinate all emergency response measures?</p> <p>Not sure Mr. P. was knowledgeable Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>B) Is the following information posted next to the telephone:</p> <ul style="list-style-type: none"> - the name and telephone number of the emergency coordinator? - the location of fire extinguishers and spill control equipment and, if present, fire alarms? - the number of the fire department unless the facility has a direct alarm? <p>Yes _____ No _____ N/A _____</p> <p>C) Have employees received the proper waste handling and emergency procedures training relevant to their positions?</p> <p>Yes _____ No _____ N/A _____</p> <p>D) If there have been any emergencies that required a response, did the emergency coordinator comply with the requirements of Section 722.134(d)(5)(D)?</p> <p>did not see it. Yes _____ No _____ N/A _____</p> <p>Note: A small-quantity generator who must transport the waste over a distance of 200 miles or more for treatment, storage or disposal may accumulate waste on-site for up to 270 days without a permit provided that the generator complies with the requirements of subsection (d).</p> <p>SUBPART D: RECORDKEEPING AND REPORTING</p> <p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> - a copy of each signed manifest? <p>Yes _____ No _____ N/A _____</p>	did not see it, hidden? out in plain sight?
722.140(a)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> - a copy of each signed manifest? <p>Yes _____ No _____ N/A _____</p>	722.140(a)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? <p>not sure - Yes _____ No _____ N/A _____</p>	722.140(c)

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Viol
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? → action required compliance but no emergency list seen Yes <u> </u> No <u>?</u> N/A <u> </u>	722.140(d)
722.142(b)	Section 722.142 Exception Reporting Has the generator filed an exception report if a signed copy of the manifest has not been received within 60 days of the date of delivery to the transporter? No 2012/2011 manifest seen. Yes <u>?</u> No <u>?</u> N/A <u> </u>	722.142(b)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <u> </u> No <u> </u> N/A <u> </u>	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes <u> </u> No <u> </u> N/A <u>?</u> If "Yes", has the generator complied with the requirements of Subpart E? Yes <u> </u> No <u> </u> N/A <u>?</u>	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes <u> </u> No <u> </u> N/A <u>?</u> If "Yes", has the generator complied with the requirements of Subpart F? Yes <u> </u> No <u> </u> N/A <u>?</u>	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes <u> </u> No <u> </u> N/A <u>?</u> If "Yes", has the generator complied with the requirements of Subpart G? Yes <u> </u> No <u> </u> N/A <u>?</u>	722.170
	COMMENTS: Inspection was as complete as possible - not a complete picture of the facility was seen during the inspection. notes taken in field notebook at inspection, this checklist completed when I left the facility where I could write.	


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Scott Plating, Incorporated
EPA ID NO.: ILD056629629
LOCATION ADDRESS: 8034 North Central Park Avenue
Skokie, Illinois 60076
NAICS CODE: 332813, Electroplating, Plating, Polishing, Anodizing and
Coloring
RCRA CLASSIFICATON: Small Quantity Generator
DATE OF INSPECTION: January 31, 2013
EPA INSPECTOR: Robert Smith, LPG

PREPARED BY:


Robert Dean Smith, LPG

2/28/13
Date

REVIEWED BY:


Walt Francis, Acting Chief

3/5/2013
Date

Purpose of the Inspection

The purpose of this inspection was twofold: 1) EPA hand delivered a letter sent by EPA to Scott that was returned to EPA with the US Postal Service (USPO) stamp "UNCLAIMED" and 2) EPA was present to review RCRA documents that were unavailable to the inspector during the August 15, 2012, inspection of Scott.

Participants

Robert Dean Smith, LPG, Environmental Scientist, EPA
Ed Piwowarski, Scott Plating

Facility Inspection

I arrived at Scott at about 12:45 p.m. Upon arrival, I met with Mr. Piwowarski whom I met during the August 15, 2012, inspection. Mr. Piwowarski is one of two employees of Scott. I presented my credentials to Mr. Piwowarski and he recognized me as the EPA inspector who inspected Scott on August 15, 2012. Mr. Piwowarski stated that Mr. Trock, the owner of Scott, was not present due to meeting in downtown Chicago.

I presented an envelope to Mr. Piwowarski which contained an EPA letter to Mr. Trock dated November 6, 2012. Attached to the letter was the original IEPA letter to Scott dated August 17, 2007. I inadvertently removed said letter from Scott during my August 15, 2012, inspection. The envelope presented to and accepted by Mr. Piwowarski was addressed to Mr. Scott Trock, 8034 North Central Park Avenue, Skokie, Illinois but was marked by the USPS with a stamp that stated "UNCLAIMED".

I explained to Mr. Piwowarski that I had inadvertently taken the letter while he accompanied me during the August 15, 2012, inspection. Mr. Piwowarski stated that no mail is delivered to said address which is the facility's address. Mr. Piwowarski stated that all mail is sent to a Post Office box.

I stated to Mr. Piwowarski that I was present to review documents that were not available during my August 15, 2012, inspection. Mr. Piwowarski indicated that Mr. Trock would be the person to talk to and Mr. Piwowarski requested that I give him my business card again so that he could tell Mr. Trock what I needed that that Mr. Trock would call me to schedule a time for me to return to the facility. I gave Mr. Piwowarski my business card and stated that it is likely that Mr. Trock would have to schedule a time for me to visit due to his absence from the facility.

I left the facility and walked around the rear of the facility through a public alley way. I observed that four supersacks of hazardous waste were now stored outside in the rear of Scott's facility. The hazardous waste was covered with visqueen and I could see some hazardous waste stickers but could not read the date or other information on the hazardous waste stickers. I photographed the supersacks of hazardous waste and left Skokie for the EPA office.

Scott Plating Photographs



Facility: Scott Plating, Inc. 8034 North Central Park Avenue, Skokie, Illinois, 60076, ILD056629629

Location: Public Alleyway, behind the facility.

Date: January 29, 2013, 1:21 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Photograph 1: Four supersacks of hazardous waste in storage behind the facility. The supersacks are covered with visqueen and it is difficult to see or read hazardous waste stickers.



Facility: Scott Plating, Inc. 8034 North Central Park Avenue, Skokie, Illinois, 60076, ILD056629629

Location: Public Alleyway, behind the facility.

Date: January 29, 2013, 1:21 p.m.

Photographer: Robert Dean Smith, LPG

Camera: Nikon Coolpix, 12.0 megapixels

Photograph 2: Four supersacks of hazardous waste in storage behind the facility. The supersacks are covered with visqueen and it is difficult to see or read hazardous waste stickers. Close up of photograph 1.